

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*

2 Sophia S. Lau, Esq., Nevada Bar No. 13365
3 *slau@earlysullivan.com*

3 EARLY SULLIVAN WRIGHT
4 GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105
5 Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593
6 Facsimile: (702) 331-1652

7 Kevin S. Sinclair, NV Bar No. 12277
8 *ksinclair@sinclairbraun.com*

9 SINCLAIR BRAUN LLP
10 16501 Ventura Blvd, Suite 400
11 Encino, California 91436
12 Telephone: (213) 429-6100
13 Facsimile: (213) 429-6101

14 Attorneys for Defendants

15 CHICAGO TITLE INSURANCE COMPANY and TICOR
16 TITLE OF NEVADA, INC.

17 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
18 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

19 Gary L. Compton, State Bar No. 1652
20 2950 E. Flamingo Road, Suite L
21 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 BANK OF NEW YORK MELLON,

19 Plaintiff,

20 vs.

21 FIDELITY NATIONAL TITLE GROUP,
22 INC. et al.,

23 Defendants.

Case No.: 2:21-CV-00452-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

24 COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and Ticor
25 Title of Nevada, Inc. (“Ticor Agency”) (collectively “Defendants”) and plaintiff The Bank of
26 New York Mellon (“BONY”), by and through their respective attorneys of record, which hereby
27 agree and stipulate as follows:

1 1. On March 18, 2021 BONY filed its complaint in the Eighth Judicial District Court
2 for the State of Nevada;

3 2. On March 18, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Chicago Title and Ticor Agency's responses to BONY's complaint are currently
6 due on April 16, 2021;

7 4. Counsel for Defendants request a 35-day extension, through and including Friday,
8 May 21, 2021 for Defendants to file their respective responses to BONY's complaint to afford
9 Defendants' counsel additional time to review and respond to BONY's complaint.

10 5. Counsel for BONY does not oppose the requested extension;

11 6. This is the first request for an extension made by counsel for Defendants, which is
12 made in good faith and not for the purposes of delay.

13 7. This stipulation is entered into without waiving any of Defendants' objections
14 under Fed. R. Civ. P. 12.

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Friday, May 21, 2021.

3 Dated: April 8, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 CHICAGO TITLE INSURANCE COMPANY
9 and TICOR TITLE OF NEVADA, INC.

10 Dated: April 8, 2021

11 WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Darren T. Brenner

13 DARREN T. BRENNER
14 Attorneys for Plaintiff
15 THE BANK OF NEW YORK MELLON

IT IS SO ORDERED.

16 Dated this 9th day of April, 2021.

17 
18 _____
19 CAM FARENBACH
20 UNITED STATES MAGISTRATE JUDGE